

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

AMP GLOBAL STRATEGIES, LLC,
a Pennsylvania limited liability
company,

Plaintiff,

v.

ASK COMMUNICATIONS LLC,
a Delaware limited liability
company,

Defendant.

Case No. 1:23-cv-01894

Honorable Charles P. Kocoras

**PLAINTIFF'S MOTION FOR THE ENTRY OF A MONEY JUDGMENT AGAINST
DEFENDANT ASK**

Plaintiff, AMP GLOBAL STRATEGIES, LLC, by and through its undersigned attorney, moves this Court pursuant to Rule 54 of the Federal Rules of Civil Procedure for the entry of a money Judgment against Defendant, ASK COMMUNICATIONS LLC, as follows:

1. On March 27, 2023, Plaintiff, AMP Global Strategies, LLC ("AMP"), filed a one-count Complaint for breach of written contract against Defendant, ASK Communications LLC ("ASK"), seeking \$225,945.10 (\$100,300 in Count I; and \$125,645.10 in Count II) in compensatory damages.
2. On June 8, 2023, the Court entered an Order of default against Defendant, ASK.
3. Now, AMP seeks the entry of a money judgment under its Complaint against ASK.

4. In connection therewith, Plaintiff, AMP, submits the Affidavit of Brenda Pugh, Chief Executive Officer of AMP. (A true and correct copy of the Affidavit of Brenda Pugh is attached hereto as Exhibit "A" and made a part hereof).
5. In that Affidavit, Ms. Pugh sets forth the basis of the damages that AMP has sustained as a result of the breach of contract by ASK. (Affidavit of Brenda Pugh at ¶¶ 9-11).
6. The damages sustained by the non-payment of AMP's invoices total \$103,000. (Affidavit of Brenda Pugh at ¶ 11).
7. The damages sustained from the breach by ASK of the non-solicitation provision of the Agreement are \$43,145.10 and \$82,500, for a total of \$125,645.10. (Affidavit of Brenda Pugh at ¶¶ 12-18).
8. The total damages sustained by the breaches of contract by ASK total \$225,945.10. (Affidavit of Brenda Pugh at ¶ 18).
9. By this Motion, AMP seeks the entry of a judgment in this case against ASK in the amount of \$225,945.10, as set forth in its Complaint.

WHEREFORE, Plaintiff, AMP GLOBAL STRATEGIES, LLC, respectfully requests that this Court enter judgment in its favor and against Defendant, ASK COMMUNICATIONS LLC, in the amount of \$225,945.10 and for such other and further relief as the Court deems necessary and/or appropriate under the circumstances

Respectfully submitted,

AMP GLOBAL STRATEGIES, LLC,
Plaintiff

/s/ Daniel J. Voelker

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Dated: June 16, 2023

CERTIFICATE OF SERVICE

I, Daniel J. Voelker, an attorney, hereby certify that on June 16, 2023, I filed the above **Plaintiff's Motion For The Entry Of A Money Judgment Against Defendant ASK** via the CM/ECF System of the Clerk of the United States District Court for the Northern District of Illinois, and served the same personally on the registered agent of Defendant, ASK Communications, LLC, Spiegel & Utrera, P.A., at its Chicago office located at 2340 Des Plaines River Road, Des Plaines, Illinois 60018.

/s/Daniel J. Voelker